

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DANIEL JOYCE,
Individually and on behalf of a class of others
similarly situated,

Plaintiff,

v.

JOHN HANCOCK FINANCIAL SERVICES,
INC. and JOAN M. DICICCO,

Defendants.

Civil Action
No. 05-11428-WGY

**STIPULATION AND PROPOSED ORDER TO EXTEND DISCOVERY AND
DISPOSITIVE MOTIONS DEADLINES**

IT IS HEREBY STIPULATED by the parties hereto, Plaintiff Daniel Joyce and Defendants John Hancock Financial Services, Inc. and Joan M. DiCicco, subject to the approval and Order of the Court, that:

1. the parties shall have until May 8, 2006 to complete all discovery; and
2. all dispositive motions shall be served within 30 days after the close of discovery, or no later than June 7, 2006.

Counsel state as grounds for this Stipulation and Proposed Order that while the parties have been diligently pursuing discovery and fulfilling their discovery obligations, an extension of discovery is necessary for several reasons, including that (1) Plaintiff has served a subpoena for documents on a third party, Beacon Capital Partners Management, LLC, for which documents have not yet been produced; (2) document collection and production efforts by the Defendants recently concluded; and (3) several depositions that rely in part on the documents produced in this matter remain to be taken. Counsel further state that to the extent that the

parties' dispositive motions will rely upon documents that are produced and deposition testimony that is taken in this matter, it is necessary to extend the deadline for such motions to a date following the close of discovery that allows sufficient time for these discovery materials to be analyzed.

Respectfully Submitted,

DANIEL JOYCE,

JOHN HANCOCK FINANCIAL
SERVICES, INC. AND
JOAN M. DICICCO,

By his attorneys,

By their attorneys,

/s/ Seth J. Robbins

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IT IS SO ORDERED.

Dated: March ___, 2006

United States District Judge William G. Young

CERTIFICATE OF SERVICE

I, Erin N. Jackson, hereby certify that on March 8, 2006 this STIPULATION TO EXTEND DISCOVERY AND DISPOSITIVE MOTIONS DEADLINES was filed through the ECF system and will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on this date.

Date: March 8, 2006

/s/ Erin N. Jackson

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